REMARKS

Claims 27-40 are pending in the application. Claims 27, 28, 33, 35, and 36 were rejected under 35 USC 103(a) as being unpatentable over US patent 6,151,609 (Truong) in view of US patent 7,054,952 (Schwerdtfeger et al.). Claims 29-32 and 37-40 were rejected under 35 USC 103(a) as being unpatentable over Truong in view of Schwerdtfeger and US patent publication 2003/0195886 (Vishlitzky). Claim 34 was rejected under 35 USC 103(a) as being unpatentable over Truong in view of Schwerdtfeger and WO 2002-095954 (Lee).

Claims 27, 33, 36, and 37 are amended herein. No new matter is added

Response to Advisory Action of 05/12/2009

1) Examiner does not find an "edit" element recited in the claims. Applicant submits that to modify a file is to edit it. The independent claims now recite "wherein the selected ones of the files in the second format are modified by the remote client." This element is supported in the following lines and throughout.

> Paragraph 26, lines 1-4: "*In the remote client 4 the copies of the files stored on the storage device 7 which were converted by the interface into a format which could be processed by the remote client 4 are modified, but new files can also be created.*"

2) Examiner notes that the test of obviousness is what the combined teachings of the references would have suggested. However, a suggestion answers why one would make the combination, as opposed to what combinations could be made. Why would one convert files on the Truong server to html for transmission to a client if they are already in html as illustrated in Truong (FIGs 4-6 and appendix A)? Examiner has not identified any files on the Truong server in a first format that could beneficially be converted to a second format for transmission to, and modification by, a client. Converting any file shown in Truong from html to another format would make the converted file inoperable on a client browser without changing the principle of operation of Truong. Why would one change the principle of operation for no reason? No benefit is suggested by the combination and thus there is no motivation for the combination.

KSR v Teleflex 550 U.S. ___ (2007) Syllabus I. (b): The TSM test captures a helpful insight: A patent composed of several elements is not proved obvious merely by demonstrating that each element was, independently, known in the prior art. Although common sense directs caution as to a patent application claiming as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the art to combine the elements as the new invention does. Inventions usually rely upon building blocks long since uncovered, and claimed discoveries almost necessarily will be combinations of what, in some sense, is already known.

MPEP 2143.01 V. THE PROPOSED MODIFICATION CANNOT RENDER THE PRIOR ART UNSATISFACTORY FOR ITS INTENDED PURPOSE

If proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification.

MPEP 2143.01 VI. THE PROPOSED MODIFICATION CANNOT CHANGE THE PRINCIPLE OF OPERATION OF A REFERENCE

If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims prima facie obvious. In re Ratti, 270 F.2d 810, 123 USPQ 349 (CCPA 1959)

3) Regarding claim 33, Examiner cites Truong, col. 5, lines 41-67. However, these lines do not mention file editing or modification or format conversion at all. It is unclear how these lines were intended to support the rejection. They simply describe a client obtaining a web page from the Internet by entering a URL into a browser.

4) Regarding claim 35, Examiner cites Schwerdtfeger col. 3, lines 13-52, including specifically: "*The model may also define methods for accessing and manipulating the document. The model may be, for example, a document object model DOM.*" However, none of lines 13-52 mention limiting access to one of several clients as claimed. It is unclear how these lines were intended to support the rejection. Schwerdtfeger does not mention anything about client authorization, security, or limiting of access.

5) Regarding claim 36: Truong FIGs 3A and 3B teach sending a password to a server (step 118), validating the password (steps 130, 132), and rejecting a client not authorized to

used the system (steps 132, 134). However, this is system level authorization. The phrase "specific selection of files" or equivalent is not found in Truong. This is a phrase taken from Applicant's claim and specification (par. 33, line 8). Claim 36 recites authorizing specific files to specific clients, and is further clarified by the amendment herein, as supported in paragraphs 32-33.

Response to rejections under 35 USC 103

The arguments below are in response to the final office action of 02/23/2009, but are revised in view of Examiner's comments in the advisory action of 05/12/2009 and the amendments herein. Applicant appreciates the comments provided in the Advisory Action which have clarified the Examiner's concerns and have allowed the Applicant to make the clarifying amendments herein.

6) Regarding claim 27: Examiner cites Truong's server 15 with memory 46 and mass storage 44, but does not identify client modifiable files for configuration of an automation system as claimed. In Truong col. 7, lines 38-40: "*Operating system 38 and remote editor program 40 are stored in mass storage device 44 and are shown loaded into server memory 46.*" These elements 38 and 40 are not modified by a client in Truong. These are the operating system and the editor application that are executed on the server. FIGs 5 and 6 illustrate a display of an html file being edited. This file is not for production or configuration of an automation system.

FIG 3 of Truong shows a list of editable files in a path on the server 15, including such files as "Welcome.html". These are html files, and thus do not need conversion to a second format that can be processed and modified by a remote client web browser 32. Truong does not teach or imply conversion of file formats as claimed.

Examiner concedes that Truong does not teach converting the received files into the first format. However, Truong also does not teach converting the transmitted files from the first format into the second format. There is no explicit or implied suggestion or need for format conversion in Truong, as noted above.

Examiner motivates a combination of Truong and Schwerdtfeger as follows:

a) To provide access to files by a client in a first format. However, the present invention provides access to files by a client after conversion to a second format.

b) To translate a document from one file format to a script expressed into a second format. This is a conclusory statement that a format conversion could be done, not a motivation. A format conversion would change the principle of operation of Truong, and thus is not motivated.

c) Examiner asserts "In addition it supplies a description of the elements within some portion of a particular document and includes identifiers assigned to the elements within some portion of the document". However, this is not claimed, and is unrelated to the invention.

7) Regarding claim 33: The above arguments regarding claim 27 also apply here. Examiner cites Truong's editor 40 as receiving files created or modified by the remote client, and converting the received files from a received format into the first format. However, this is not supported by the cited lines: "*receiving a file selection from the web browser at the server, the file selection identifying one of the files; and communicating a copy of one of the files from the server to the web browser for editing;*". This citation describes a client identifying a file to be edited, and the server transferring the selected file to the client. It does not describe transferring the file from the client to the server, or any format conversion of the file.

8) Regarding claim 35: Examiner does not identify an access management element that only allows access to a file by one client. Examiner cites a transcoder proxy and a PDA of Schwerdtfeger, but does not indicate how either of these elements prevents access to a file by multiple clients. Without access management, multiple PDAs could use the same or multiple transcoder proxies on the same file at the same time.

9) Regarding claim 36: Examiner cites Truong FIG 3B, step 118. Applicant assumes FIG 3A was meant. However, step 118 is silent as to authorizing a given client to access a given selection of files. Instead it grants a client access to a server. Truong, col. 7, lines 17-19: "*The logon ID, password, and remote server path inputs identify a particular user and whether the user has access rights to remote Internet server 15.*"

10) Regarding claims 31 and 39: Examiner cites Vishlitsky par. 48, which describes a process of testing a pair of resource locks to see if the resource is available, if so, reserving the resource, if not, releasing the locks. However, a later requesting process does not notify an earlier process with current access that the later requesting process is requesting access. Thus, it does not meet the claims even if one considers a process as a client.

11) Regarding claim 32: Examiner cites Vishlitsky par. 48, FIG 5, which describes device information tables that map available cylinders and tracks on a disk. Clients are not listed in these tables, and the listed devices, cylinders, and tracks are not selected by their listed order in the table. The tables represent direct access storage. Cylinders and tracks are selected randomly, not sequentially, in order to copy only the tracks needed by a process at a given time into virtual storage, rather than a whole volume. This does not relate to assigning different access priorities for different clients, such that a later requesting client may override an earlier requesting client, and it does not meet the claim.

12) Regarding claim 40: Examiner cites Vishlitsky par. 49, FIG 7, which describes a process of locating and locking a track before using it. No notification to an earlier requesting process with current access is made by a later requesting process that access is being requested, so this does not meet the claim.

13) Regarding claim 34: The arguments regarding claim 27 and 33 above apply. Format conversion is not done in Truong, is not needed, and would not make sense, because it would make Truong inoperable without changing his principle of operation for no reason. Thus, the combination is not motivated. Schwerdtfeger only performs format conversion in one direction for display, so even if the combination were made, it would not meet claim 33.

14) Lee does not address the deficiencies of Truong and Schwerdtfeger as argued above.

Conclusion

M.P.E.P. 2143.03 provides that to establish prima facie obviousness of a claimed invention, all words in a claim must be considered in judging the patentability of that claim against the prior art. If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious.

As argued above, the proposed combinations are not motivated and do not produce the invention as claimed, so they do not support the obviousness rejections. This application is in condition for allowance, which is respectfully requested.

The commissioner is hereby authorized to charge any appropriate fees due in connection with this paper, including the fees specified in 37 C.F.R. §§ 1.16 (c), 1.17(a)(1) and 1.20(d), or credit any overpayments to Deposit Account No. 19-2179.

Respectfully submitted,

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